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Attorneys for Defendants NAPHCARE, INC., NAPHCARE, U.S., INC., ALAN V. AGUILAR,
TIFFANY MENDOCA (erroneously sued as "MENDONCA"), ALICIA CLARKE and JEFFREY
ALVAREZ, M.D.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

WENDELL TRAYVON MARTIN, deceased, by
and through RAYMOND MARTIN, as Successor
in Interest; and RAYMOND MARTIN,
individually,

Plaintiffs,

vs.

COUNTY OF KINGS; DAVID ROBINSON,
Sheriff-Coroner-Public Administrator, Kings
County; KIM PEDREIRO, Jail Commander, Kings
County Sheriff's Department; Detention Sergeant
ROBERT VALDEZ; Detention Deputy MARYA
RAZO; Detention Deputy RODOLFO
BEJARANO; Detention Senior Deputy JOSHUA
COTA; Detention Sergeant HUMBERTO
HERNANDEZ; Detention Deputy BRIAN DAVIS;
Detention Senior Deputy CRAIG HOUSTON
(ID#5314); Detention Senior Deputy RUBEN
GONZALEZ; Detention Deputy BRIANNA
BROOKS; Detention Deputy EMMANUEL DIAZ;
Detention Deputy PATRICK FOWLER; Registered
Nurse ALAN V. AGUILAR; NAPHCARE, INC.;
NAPHCARE U.S., INC.; Licensed Vocational
Nurse TIFFANY MENDONCA; JEFFREY
ALVAREZ M.D.; Registered Nurse ALICIA
CLARKE; and DOES 1 through 60, inclusive,

Defendants.

CASE NO.: 1:20-cv-00288-DAD-BAM

**STIPULATION AND ORDER TO MODIFY
SCHEDULING ORDER (ECF NO. 63)**

The parties hereby stipulate and agree to modify the Scheduling Order (ECF No. 63) in this matter as follows:

1. This is a case involving the death of WENDELL TRAYVON MARTIN while he was an inmate at Kings County Jail in Hanford, California. The parties have been diligently moving forward with discovery including extensive written discovery. Defendants have also completed the deposition of Plaintiff RAYMOND MARTIN. Given the sheer volume of documents involved in this matter, the depositions of the individual Defendants have yet to be taken. In order to conduct meaningful depositions of these individuals, the relevant documents need to be exchanged among the parties. This process is nearly complete and the parties anticipate that the depositions of the Defendants, specifically the NaphCare Defendants, will be completed within the next 90 days.

2. In addition, a resolution has been reached between Plaintiff and the County of Kings and the related individual defendants. Since the settlement involves a government entity, it requires approval by governmental boards. If the discovery deadlines are not extended, the parties would be required to undertake a significant number of depositions out of an abundance of caution which would be rendered moot upon approval of the settlement.

3. Moreover, initial discovery in this matter was delayed due to illness by Plaintiff's counsel which required emergency surgery and, in recent months, COVID-19 related issues for NaphCare's counsel and his staff additionally caused a significant and unexpected delay in discovery.

4. Therefore, despite diligent efforts, and given the number of defendants in this case, the parties will not be able to complete the non-expert discovery by the current deadline. Therefore, the parties agree to continue the discovery dates as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Amendment of Pleadings	April 19, 2021	Closed
Expert Disclosure	July 1, 2022	November 1, 2022
Supplemental Expert Disclosure	August 1, 2022	December 1, 2022
Non-expert Discovery Cutoff	May 20, 2022	September 20, 2022

Expert Discovery Cutoff	September 9, 2022	January 9, 2023
Pretrial Motion Filing Deadline	November 4, 2022	March 3, 2023
Last Day to File Dispositive Motions	November 22, 2022	March 22, 2023

DATED: March 18, 2022

LAW OFFICE OF STEWART KATZ

/s/ Stewart Katz

By: _____
Stewart Katz, Esq.
Attorneys for Plaintiffs

DATED: March 18, 2022

THE SCHAPS LAW OFFICE, A.P.C.

/s/ Michael A. Schaps

By: _____
Michael A. Schaps, Esq.
Attorneys for Plaintiffs

DATED: March 18, 2022

WEAKLEY & ARENDT, P.C.

/s/ James Arendt

By: _____
James Arendt, Esq.
Attorneys for Defendants COUNTY OF KINGS,
DAVID ROBINSON, KIM PEDREIRO, HUMBERTO
HERNANDEZ, BRIAN DAVIS, CRAIG HOUSTON,
RUBEN GONZALEZ, BRIANNA BROOKS,
EMMANUEL DIAZ & PATRICK FOWLER

DATED: March 18, 2022

MAYALL HURLEY, PC

/s/ Mark E. Berry

By: _____
Mark E. Berry, Esq.
Attorneys for Defendants ROBERT VAZQUEZ,
MAYRA RAZO LOPEZ, RODOLFO BEJARANO &
JOSHUA COTA

1 DATED: March 18, 2022

LAURIA TOKUNAGA GATES & LINN, LLP

2 /s/ Paul A. Cardinale

3 By: _____

Paul A. Cardinale, Esq.

4 Attorney for Defendants NAPHCARE, INC.,

5 NAPHCARE, U.S., INC., ALAN V. AGUILAR

6 TIFFANY MENDOCA (erroneously sued as

“MENDONCA”), ALICIA CLARKE and JEFFREY

7 ALVAREZ, M.D.

8
9 **ORDER**

10 Pursuant to the parties’ stipulation, and good cause appearing, the request to modify the
11 Scheduling Order is GRANTED. The Scheduling Order in this matter is modified as follows:

12 Expert Disclosure: November 1, 2022

13 Supplemental Expert Disclosure: December 1, 2022

14 Non-expert Discovery Cutoff: September 20, 2022

15 Expert Discovery Cutoff: January 9, 2023

16 Pretrial Motion Filing Deadline: March 3, 2023

17 Last Day to File Dispositive Motions: March 22, 2023

18 The Pretrial Conference on June 19, 2023 remains as scheduled. The parties are cautioned that
19 further modifications of the Scheduling Order will not be granted absent a demonstrated showing of
20 good cause.

21 IT IS SO ORDERED.

22 Dated: **March 23, 2022**

/s/ *Barbara A. McAuliffe*

23 UNITED STATES MAGISTRATE JUDGE